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May 29, 2020

Honorable Alison J. Nathan
United States District Court
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

Re: Common Cause/New York v. Brehm, et al., 1:17-cv-06770-AJN

Dear Judge Nathan:

We write on behalf of the Parties in the above-captioned action to provide a status update regarding the agreement-in-principle that the Parties have reached with respect to Plaintiff's application for an award of attorneys' fees and expenses (the "Fee Application").

Defendants have provided a draft settlement agreement, which Plaintiffs are currently reviewing and expect to provide comments to Defendants next week. The Parties anticipate that the process of finalizing the settlement agreement will take several more weeks to complete.

Accordingly, the Parties jointly request that they be permitted to submit a status report to the Court with respect to the approval process on or before July 15, 2020.

We are available at the Court's convenience to address any questions.

Respectfully submitted,

/s/ Neil A. Steiner

Neil A. Steiner

cc: All Counsel of Record by ECF